100 Mile House Timber Supply Area
Timber Supply Review

Summary of Public Input

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This is a summary of the public input that has been received on the Timber Supply Review in the 100 Mile House Timber Supply Area. This summary does not assess the feasibility or validity of the input or whether it relates to the clearly defined mandate of the chief forester in the allowable annual cut determination.

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100 Mile House Timber Supply Area

Background

As part of the review of timber supply in the 100 Mile House Timber Supply Area, the British Columbia Ministry of Forests distributed a *Public Discussion Paper* and two technical reports, the *Timber Supply Analysis Report* (and an *Addendum*) and the *Socio-Economic Analysis*. The public was encouraged to review and comment on the accuracy of the information in these documents and to provide additional information. This report summarizes the input received during the 90-day review period. This information was provided to the chief forester for his consideration when he reviewed the allowable annual cut for the 100 Mile House Timber Supply Area.

The first section of this summary outlines the public review process implemented by the Forest Service, and describes the types of public input received. The second section summarizes the public input in sufficient detail to indicate the range of input received. The original submissions (with personal identifiers removed in accordance with the *Freedom of Information and Protection of Privacy Act*) can be reviewed at the 100 Mile House Forest District office.

Public Review Process and Response

100 Mile House District staff actively solicited public input on the Timber Supply Review in the 100 Mile House Timber Supply Area through the following actions:

- direct mail-out of the *Timber Supply Analysis Report* and the *Public Discussion Paper* to 40 individuals, businesses and First Nations, with an offer to conduct information sessions if requested. The *Public Discussion Paper* included a response form that readers were encouraged to complete and return to the district manager.
- one information session was held with representatives from a timber company (see Table 1)
- four extensively advertised open houses were held

As Table 1 shows, 16 people attended the information session and the open houses. The Forest District also received nine written submissions (see Appendix 1). The Cariboo Lumber Manufacturers Association, on behalf of the 100 Mile House Timber Supply Area Licensee Association, commissioned a consultant to technically critique the *100 Mile House Timber Supply Analysis Report* and *Addendum* (referred to as the 'technical critique' in this report).

Organizations (No. of participants)	Date
Meetings with interest groups	
Lignum Ltd. (10)	April 7, 1995
Open Houses	
100 Mile House, Forest Grove, Roe Lake, Clinton (6)	May 1-9, 1995

Table 1: Participation in public information activities

Public Input

In this section, public input on the information presented in the three Timber Supply Review documents for the 100 Mile House Timber Supply Area is summarized under the following headings:

- timber supply analysis
- socio-economic analysis
- discussion paper

Public input on ongoing government processes that may influence the timber supply in the 100 Mile House Timber Supply Area in the future is summarized at the end of this section.

Timber Supply Analysis

Technical critique

The technical critique confirms the results of the timber supply analysis carried out by the Forest Service. Using the same assumptions regarding size of the land base, forest productivity and management practices, the critique obtained the same estimate of timber supply for at least the next 30 years.

The critique also includes an analysis of the impact of using different ages for defining older forests, using different estimates for the extent of selective harvesting, and using different estimates for timber productivity estimates associated with selective harvesting. The critique indicates there is no difference in the timber supply shown in the forest service analysis for the next 30 years and only a slight change after 30 years.

In their submission, the licensee association makes the following additional points:

- the exclusion of problem forest types from the analysis raises concerns about the mutual impacts of the various types of licences existing in the timber supply area. The association proposes that a comprehensive analysis of the entire timber supply is required to ensure commitments to all licensees are met.
- development of the timber resource must not be considered a residual activity to be acted upon after all other users have been accommodated. The development and achievement of resource targets, as recommended in the Cariboo-Chilcotin Land Use Plan, is important.

Other Public Input

- **Problem forest types**
  Ainsworth Lumber Co. Ltd. recommends the Forest Service continue to identify 137,000 hectares of problem forest types, separate from the allowable annual cut. The company says other licensees' concerns about the effects of Ainsworth's pulpwood agreement on their development plans are currently unfounded. These concerns, expressed also by the Ministry of Environment, Lands and Parks, relate to the availability of sawlog cutting areas when adjacent harvested pulpwood areas are not yet greened up. Ainsworth says in fact they have already experienced a reduced availability of pulpwood stands due to sawlog harvesting. The company also points out the harvest of problem forest types will increase the size of the timber harvesting land base, by converting some of these lands to the production of sawlogs.
- **Maintaining biodiversity and older forests**
  The submission from the Quesnel River Watershed Alliance says overcutting and past management practices have put conservation values at risk within the Quesnel River watershed. This has occurred through the conversion of older forests to younger forests, of intact forests to fragmented ones and of natural, diverse forests to managed, simplified plantations.

  The Ministry of Environment, Lands and Parks expresses concern about the lack of representation of all age classes of Douglas-fir forests in the landscape through time. Their submissions say the proposed 50 per cent removal of volume at the first pass, followed by re-entries every 30 years, is unlikely to meet the needs of other non-timber resources.

  Ainsworth Lumber maintains that meeting biodiversity goals requires the effective use of timber harvesting, rather than forest age restrictions (the restriction, for example, that 15 per cent of the forest must be older than 150 years at all times in the integrated resource management zone). Ainsworth is of the opinion such requirements for maintaining old growth forests should be eliminated. Their submission says adaptive management (management for specific attributes such as snags, coarse woody debris, etc.) can conserve or reproduce older forest values at little cost during harvesting. Ainsworth asserts that enforcing age requirements doesn't recognize the older forest values already present in protected areas, special management areas and riparian zones.

Ainsworth also maintains that protected areas threaten the working forest because they are a source of natural disturbances such as fire, insects and disease. The company recommends keeping protected areas small and moving them across the landscape as forests develop. Some forest management should be allowed within protected areas to protect forest values outside them.

The licensee association suggests that defining old growth forests on the basis of age doesn't account for management practices that mimic, conserve or create older forest attributes. They suggest that definition by age likely overcompensates for old growth forest values.

The Ministry of Environment, Lands and Parks also expresses concern about the definition of old growth forests, and remark that most scientific sources use 200 years as the minimum age for defining ecologically functional old growth forests. The Forest Service analysis uses 150 years of age to define the old growth. The Ministry of Environment, Lands and Parks expects this to lead to serious shortages of older forests at various points in the future.

- **Wildlife**
  The Ministry of Environment, Lands and Parks emphasizes that the maintenance of habitat is the only way to guarantee the protection of fish and wildlife populations; the success of other measures, such as stocking lakes or imposing new regulations, is not assured. With declining budgets, this agency says it is unable to undertake costly programs to offset negative impacts.

  The Quesnel River Watershed Alliance maintains that the removal of wildlife habitat from the timber harvesting land base in the Forest Service analysis is based on outdated wildlife data and a comprehensive ecological assessment of habitats is now required. They point out that many wildlife species within the watershed are on the Ministry of Environment, Lands and Parks red and blue lists (endangered and threatened species).

  Ainsworth Lumber predicts that their pulpwood agreement will enhance wildlife habitat in the following ways:

  - logging disturbance will maintain the presence of deciduous forests, important for wildlife
  - low quality pulpwood stands will be replaced by stands that provide improved wildlife habitat

  They also state that pressures on wildlife from improved access can be controlled with access management plans.

  - **Mule deer winter range**
    Ministry of Environment, Lands and Parks staff consider the information used to estimate areas and volumes reserved from harvesting within mule deer winter range areas to be outdated. Because many Douglas-fir stands have been salvage harvested as a result of fir bark beetle attacks, the actual area reserved is overestimated by 25 per cent in the Forest Service analysis. The Ministry of Environment, Lands and Parks recommends that a new regional mule deer strategy and fir re-inventory be done.

    The licensee association states that existing and target mule deer populations have not been identified and much more work and analysis is needed to adequately address this issue.

- **Productivity estimates**
  One submission highlights the urgent need to monitor the long-term productivity of forest soils in order to confidently predict long-term tree growth. This respondent suggests that the extent of site degradation occurring in the timber supply area is not acknowledged in the Timber Supply Review and records a particular concern about thin, high elevation soils and soils that support both range and timber activities.

- **Minimum harvest age**
  The Ministry of Environment, Lands and Parks notes Douglas-fir has shown the ability to put on rapid growth at ages older than the defined

minimum harvest age. This potential increase in volume, they point out, is lost if harvesting occurs at the defined minimum age.

- **Visual quality**
  Two individual submissions note the importance of the visual quality around major lakes and residential areas, such as Canim and Bonaparte Lakes and suggest visual quality be protected. They suggest clearcutting is not appropriate in these visible locations.

Socio-Economic Analysis

- **Employment and community impacts**
  Both forest industry submissions suggest that the *Socio-Economic Analysis* does not recognize the contribution and importance of the forest sector, and instead presents a negative picture of timber harvesting. The following specific points are made in their submissions:
    - all resource-based industries, not just tourism and recreation, have growth potential if access to resources is secured
    - the conflict around supply of wood to value-added manufacturers does not result from the unwillingness of larger operators to sell small, specially-sorted volumes, but from the value-added businesses' unwillingness to pay the cost of higher value product
    - continuing mechanization of the industry is simply a response to rising costs; one of the major factors is government fees and charges, which have almost quadrupled since the early 1980s
    - the annual salary generated from seasonal forestry work is not recognized in the use of person-years as a measure of employment
    - benefits and taxes from forest sector employment are not considered
    - the inclusion of certain sectors (e.g., public sector) in basic employment estimates dilutes the importance of the forest sector; by excluding them, the contribution of forestry to the basic sector rises from 27 per cent to 40 per cent
    - 1994 stumpage increases should be included in estimating future government revenues
    - "threshold" factors are not considered; proportional reductions in timber supply can only occur to a certain point before processing plans are no longer economical to operate
    - 60 Ministry of Forests employees should be included in estimates of forest sector employment
    - over two-thirds of the tourism sector's business comes from forest industry-generated income or visitors to forest industry families

Ainsworth Lumber Co. states their contribution to the economy is not fully recognized in the *Socio-Economic Analysis*, and makes the following points:

- their oriented strand board plant operated for almost half of 1994 and should have been included in the analysis
- direct employment should be 843, not 214 (including plants in 100 Mile, Chasm and Abbotsford)
- the multiplier of 1.44 for indirect employment is conservative and does not include truck and rail transport employment, employment created in the 100 Mile House Timber Supply Area by Lignum Ltd. of Williams Lake, employment created through manufacture of Ainsworth chips into pulp and paper, and other provincial remanufacturing of Ainsworth products

The Quesnel River Watershed Alliance suggests that the *Socio-Economic Analysis* wrongly implies that any changes in forest management will jeopardize communities in the timber supply area. Their submission says this assumption ignores trends and reflects only the status quo, and does not consider the transitions made in communities like

Revelstoke and Springfield, Oregon. The alliance notes that timber supply area residents are trying to diversify their economies; they want government to protect their options and to make choices that support diversification, rather than generating fear of change.

An individual submission suggests that innovative "new forestry" harvesting technologies and new forms of tenure may compensate for employment loss due to changing timber supplies, but notes these potential innovations are not considered in the Timber Supply Review scenarios.

- **Non-timber values**
  Ainsworth Lumber Co. says the majority of tourism in this timber supply area is centred around well-developed lake areas and does not depend on significant areas of primitive or semi-primitive country. They suggest management plans should be required for tourism and recreation activities as they are for other resource development initiatives.

  The Ministry of Environment, Lands and Parks suggests the valuing of non-timber resources in the *Socio-Economic Analysis* is very uneven and doesn't take advantage of current research. The submission also states that the socio-economic analysis did not use the results of national and provincial surveys which examine fish and wildlife value in terms of actual expenditures and willingness-to-pay estimates creates a bias toward the timber resource.

Discussion Paper

Allowable annual cut adjustment
The following input was received regarding the allowable annual cut:

- the forest industry submissions maintain that both their independent analysis and the Forest Service analysis support the maintenance of the present allowable annual cut for the next five years
- the Ministry of Environment, Lands and Parks is concerned the analyses tend to overestimate the available timber supply significantly and do not include a contingency for catastrophic events; they suggest a conservative allowable annual cut, but do not specify a level
- in order to balance the effects of past overcutting and to avoid habitat fragmentation and destruction in the two-thirds of the Quesnel River watershed that does not have protected status, the alliance recommends the allowable annual cut should be reduced immediately to well below the long-term timber supply level, but they do not specify a target

Related processes

The *Discussion Paper* states that the results of decisions from the Cariboo-Chilcotin Land Use Plan and from implementation of the Forest Practices Code are not included in this Timber Supply Review. However, both the Ministry of Environment, Lands and Parks and the Quesnel River Watershed Alliance say it is imperative these factors be considered in the current determination of the allowable annual cut. They say this would protect both future timber supply and other resources from being compromised by harvesting decisions made during the next five years. This approach would also provide some allowance for the effects of climate change and soil degradation.

An individual submission expresses concern about a clash that may arise through implementation of the Land Use Plan. This clash is described as occurring between advocates for a sub-regional, "bottom-up," landscape planning approach and those who support a "top-down" approach to managing entire timber supply areas.

The Ministry of Environment, Lands and Parks states they were not brought into the Timber Supply Review process and that decisions may have been made in the analyses that do not reflect this agency's resource management objectives.

An individual submission says the Timber Supply Review process was inadequate and suggests notifying affected property-owners (especially non-residents) through a mailing rather than just through newspaper advertising.

Appendix 1

Submissions received by the 100 Mile House Forest District

Government agencies
Ministry of Environment, Lands and Parks (three submissions)

Industry
Ainsworth Lumber Co. Ltd.
100 Mile House Timber Supply Area Licensee Association

Interest groups
Quesnel River Watershed Alliance

Individuals
Three submissions